

HELEN F. DALTON & ASSOCIATES, P.C.
ATTORNEYS AT LAW

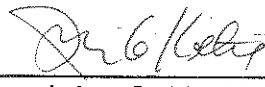
80-02 Kew Gardens Road, Suite 601, Kew Gardens, New York 11415
Tel. (718) 263-9591 Fax. (718) 263-9598

June 16, 2021

Via ECF

The Honorable District Judge John G. Koeltl
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

6/17/21 
John G. Koeltl, U.S.D.J.

Re: **Santos et al v. West 4th Street Rest. Corp**
Docket No.: 20-cv-1664 (JGK)

Dear Judge Koeltl:

Our office represents the Plaintiffs in the above-referenced matter and we submit this letter motion to respectfully request an extension of time to file the parties' settlement submission, including the settlement agreement and explanation of fairness. Pursuant to the Court's June, 2021 endorsement of the parties' prior motion for an extension of time to file, the settlement submission was due to the Court on or before June 15, 2021. We first apologize for overlooking yesterday's deadline and also respectfully request that the time to file be extended to June 30, 2021.

Our office makes the instant request as we are close to finalizing the settlement agreement draft for the parties' signatures and expect to finalize the agreement in the coming days and obtain signatures. This is the second request for an extension of time to file the settlement submissions and Defendants' counsel consents to this request. This request will not affect any other scheduled dates or deadlines.

We thank the Court for its consideration and remain available to provide any additional information.

Very truly yours,

/s/ _____
Roman Avshalumov, Esq.